



Air Quality Permitting Statement of Basis

**Tier II Operating Permit and Permit to Construct No.:
T2-020122**

Ceda-Pine Veneer, Inc. - Samuels

AIRS Facility No. 017-00036

*Prepared by:
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August 27, 2003

FINAL PERMIT

1. PURPOSE

The purpose for this memorandum is to document amendments made to Tier II Operating Permit and Permit to Construct (PTC) No. 017-00036, dated July 23, 2002, issued to Ceda-Pine Veneer, Inc., Samuels. This statement of basis specifically documents only the changes to the permit. For information regarding the technical basis for the original permit, refer to the technical memorandum dated July 23, 2002.

2. FACILITY DESCRIPTION

Ceda-Pine Veneer produces softwood veneer and green dimensional lumber. Logs are stored and debarked on site. The removed bark is used as fuel for the boiler. The logs are cut into cants and dimensional lumber. The cants are heated in the steam chambers and further processed into veneer. The veneer is dried and stored on site. The dimensional lumber is sold as a rough green product.

3. FACILITY / AREA CLASSIFICATION

The facility is not a major facility as defined in IDAPA 58.01.01.006.55 or 008.10. It is not a designated facility as defined in IDAPA 58.01.01.006.27. The facility is classified as a SM source because the potential emissions of regulated air pollutants are less than 100 T/yr as a result of the permit limitations.

Ceda-Pine Veneer is located in Samuels, which is in Bonner county and Air Quality Control Region 63. Bonner County is classified as attainment or unclassifiable for all state and federal criteria air pollutants, except the Sandpoint area, which is designated as nonattainment for PM₁₀.

4. APPLICATION SCOPE

On October 22, 2002, the Department received a request from the facility to make minor changes to the July 23, 2002 Tier II Operating Permit and Permit to Construct. The changes consist of typographical errors and minor language changes for consistency and clarity. No changes to emission limits or monitoring frequency were requested.

5. PERMITTING ANALYSIS

5.1 *Emission Inventory Review*

The facility is not requesting any changes to emission limitations in the permit. For an explanation of the emission inventory development, refer to the technical memorandum dated July 23, 2002.

5.2 *Modeling Review*

A modeling analysis is not required for this project. No changes to emission rates, stack parameters, or ambient air boundaries are being requested.

5.3 *Regulatory Review*

The applicant is only requesting typographical changes be made to the permit. No regulatory requirements are changing. For information on the regulatory requirements of the permit refer to the July 23, 2002 technical memorandum.

5.4 *FEE Review*

Because the applicant is only requesting typographical errors be corrected, no fee is required in accordance with IDAPA 58.01.01.407.02.b., which states "*So long as the Department determines no other review or analysis is required, the Tier II operating permit processing fee is not required to be submitted when: A change to correct typographical errors is requested.*"

6. **PROPOSED PERMIT CHANGES**

This section of the Statement of Basis describes the permit conditions that have been changed from the previous permit, as well as changes that were requested, but were not made.

Mailing Address (Page 1)

Per the applicants request the mailing address for the facility was changed from "100 Samuels Road, Samuels, ID 83864" to "PO Box 536, Post Falls, ID 83877."

Class (Page 1)

The applicant requested that the facility class be changed from a synthetic minor to a true minor. This change was not made because air pollution controls are required in order for the potential emissions of PM₁₀ to be below 100 tons per year. Therefore, the facility remains a synthetic minor facility. For additional information on the facility class, refer to the technical memorandum dated July 23, 2002.

Facility-Wide Condition 2.9 (Page 8)

The permit condition requires that the permittee maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis. In other words, the permittee is required to obtain a verification that the sulfur content of the fuel delivered to the facility meets the fuel sulfur content requirement of IDAPA 58.01.01.728 each time fuel is delivered to the facility. The permittee is requesting that the requirement to obtain verification on an as-received basis be changed to allow for the facility to maintain on file a certification from the supplier that the fuel delivered will meet the requirements of IDAPA 58.01.01.728. Therefore, the language in the permit was changed from "*The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.*" to "*The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content.*"

Back Up Boiler Description (Page 4, Page 10, Page 11, Page 15, and Page 16)

The applicant is requesting that the back up boiler be referred to as the "No 1 or No 2 distillate oil-fired boiler" for consistency. The permit was changed to reflect this request in Table 1.1 on Page 4, Section 3.1 on Page 10, Sections 3.6 and 3.8 on Page 11, Table 5.1 on Page 15, and Table 6.1 on Page 16 of the permit.

7. PUBLIC COMMENT

No public comment period is required because the changes made to the permit are typographical in nature and no substantive changes to emission limits or monitoring conditions have been made.

8. RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommend that the Department issue the amended Tier II Operating Permit and Permit to Construct to Ceda-Pine Veneer

DPS/sd Permit No. P-020122

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